

Kent Anderson, OSB #78-125
Kent Anderson Law Office
888 West Park
Eugene, OR 97401
(541) 683-5100
Attorney for Debtors/Plaintiffs

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF OREGON

In Re:

Darrell G. Ruse and Christy A. Ruse,
Debtors.

Case No. 09-64664-tmr13

Adv. Proc. No. 12-06185-tmr

MOTION TO DISMISS

Darrell G. Ruse and Christy A. Ruse,
Plaintiffs,

v.

Pushpin Holdings, LLC, a New York Limited
Liability Company, and Lease Finance Group,
Inc., a Minnesota corporation,
Defendants.

COMES NOW Plaintiffs, by and through their attorney, Kent Anderson, and move the
Court for an order dismissing this case with prejudice and without an award of costs or attorney
fees to either party. Additionally, Plaintiffs request waiver of any requirement to notice the
settlement reached between the parties to creditors and other interested parties.

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Page 1 – Motion to Dismiss

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1 This motion is supported by the Affidavit of Counsel filed herewith.

2 DATED this 15th day of January, 2013.

3 KENT ANDERSON LAW OFFICE

4
5 BY: /s/ Kent Anderson
6 Kent Anderson, OSB #78-125
7 Attorney for Debtors/Plaintiffs
8 Trial Attorney

9 CERTIFICATE OF SERVICE

10 I certify that on January 15, 2013, the foregoing MOTION TO DISMISS and attached
11 affidavit was served on the parties listed below to the addresses specified by the following
12 method:

13 By depositing certified true copies thereof in the US Mail at Eugene, Oregon, enclosed in
14 a sealed envelope, with postage prepaid, addressed to:

15 Joseph I. Sussman, P.C.
16 Attorney for Pushpin Holdings, LLC
Penncom Plaza
132 W. 31st Street, Suite 1320
New York, NY 10001

Lease Finance Group, Inc.
Dan Dryer, President
7700 Equitable Drive, #203
Eden Prairie, MN 55344

17 And by electronic transmission as follows:

18
19 US Trustee (USTPRegion18.EG.ECF@usdoj.gov)
20 Fred Long, Trustee (longeugctmail@qwestoffice.net)
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24 /s/ Kent Anderson
25 Kent Anderson, OSB #78-125
26 Attorney for Plaintiffs

27 **Page 2 – Motion to Dismiss**

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AFFIDAVIT OF COUNSEL

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Plaintiff,

v.

Pushpin Holdings, LLC, a New York Limited
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Inc., a Minnesota corporation,
Defendants.

STATE OF OREGON)
) ss.
County of Lane)

I, Kent Anderson, being first duly sworn, depose and say as follows:

I am the attorney for Plaintiffs in the above adversary proceeding. I make this Affidavit
in support of the Motion to Dismiss filed herewith.

Page 1 – Affidavit of Counsel

KENT ANDERSON LAW OFFICE
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1 A mutually agreeable settlement has been reached with Defendant Pushpin Holdings,
2 LLC that resolves this matter in its entirety. Plaintiffs wish to have any required noticing of the
3 settlement to creditors be waived by the Court.

4 DATED this 15th day of January, 2013.

5
6 /s/ Kent Anderson
KENT ANDERSON

7
8 SUBSCRIBED AND SWORN to before me this 15th day of January, 2013.

9
10 /s/ Lynn G. Seitz
11 NOTARY PUBLIC FOR OREGON
My Commission Expires: 3-23-2015
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